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<b>State:</b>	Arkansas	<b>Filing Company:</b>	Symetra Life Insurance Company
<b>TOI/Sub-TOI:</b>	L06I Individual Life - Variable/L06I.002 Single Life - Flexible Premium		
<b>Product Name:</b>	VCOLI		
<b>Project Name/Number:</b>	/		

## Filing at a Glance

Company:	Symetra Life Insurance Company
Product Name:	VCOLI
State:	Arkansas
TOI:	L06I Individual Life - Variable
Sub-TOI:	L06I.002 Single Life - Flexible Premium
Filing Type:	Form
Date Submitted:	11/27/2012
SERFF Tr Num:	SYMT-128784259
SERFF Status:	Closed-Accepted For Informational Purposes
State Tr Num:	
State Status:	Closed-Accepted for Informational Purposes
Co Tr Num:	

Implementation	
Date Requested:	
Author(s):	Kristen Kennedy
Reviewer(s):	Linda Bird (primary)
Disposition Date:	12/03/2012
Disposition Status:	Accepted For Informational Purposes
Implementation Date:	

State Filing Description:

**State:** Arkansas **Filing Company:** Symetra Life Insurance Company  
**TOI/Sub-TOI:** L06I Individual Life - Variable/L06I.002 Single Life - Flexible Premium  
**Product Name:** VCOLI  
**Project Name/Number:** /

## General Information

Project Name: Status of Filing in Domicile:  
Project Number: Date Approved in Domicile:  
Requested Filing Mode: Informational Domicile Status Comments:  
Explanation for Combination/Other: Market Type:  
Submission Type: New Submission Overall Rate Impact:  
Filing Status Changed: 12/03/2012  
State Status Changed: 12/03/2012 Deemer Date:  
Created By: Kristen Kennedy Submitted By: Kristen Kennedy  
Corresponding Filing Tracking Number:

### Filing Description:

Attached are revised Statements of Variability for the Policy, Coverage Description Page and Cash Value Enhancement Rider and Actuarial Memorandum for the Policy that replace the ones filed in SERFF Tracking Number SYMT-127825690 and were approved on 06/19/2012. I sent a request to reviewer, Linda Bird, to reopen the filing and she said that once a filing is approved that it cannot be reopened and to submit an informational filing. There were changes in the CVAT Tables that required a new Statement of Variability for the Policy and CD (We replaced the CVAT table with a new one. This table is found under Appendix A) and new Actuarial Memorandum. The only change to the Statement of Variability for the Cash Value Enhancement Rider was to the [Enhancement Percentage Schedule] which was listed as 0% to 100% in all years to 0% to 900% in all years. No policies have been sold.

Sincerely,  
Kristen Kennedy

## Company and Contact

### Filing Contact Information

Kristen Kennedy, Compliance Analyst II kristen.kennedy@symetra.com  
777 108th Ave. NE, Suite 1200 425-256-8047 [Phone]  
Bellevue, WA 98004-5135 425-256-5466 [FAX]

### Filing Company Information

Symetra Life Insurance Company	CoCode: 68608	State of Domicile: Washington
777 108th Ave NE, Suite 1200	Group Code: 1129	Company Type: Insurance
Bellevue, WA 98004-5135	Group Name:	State ID Number:
(800) 796-3872 ext. [Phone]	FEIN Number: 91-0742147	

## Filing Fees

Fee Required? No  
Retaliatory? No  
Fee Explanation:

<b>SERFF Tracking #:</b>	SYMT-128784259	<b>State Tracking #:</b>	<b>Company Tracking #:</b>
<b>State:</b>	Arkansas	<b>Filing Company:</b>	Symetra Life Insurance Company
<b>TOI/Sub-TOI:</b>	L06I Individual Life - Variable/L06I.002 Single Life - Flexible Premium		
<b>Product Name:</b>	VCOLI		
<b>Project Name/Number:</b>	/		

## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Accepted For Informational Purposes	Linda Bird	12/03/2012	12/03/2012

<b>SERFF Tracking #:</b>	SYMT-128784259	<b>State Tracking #:</b>	<b>Company Tracking #:</b>
<b>State:</b>	Arkansas	<b>Filing Company:</b>	Symetra Life Insurance Company
<b>TOI/Sub-TOI:</b>	L06I Individual Life - Variable/L06I.002 Single Life - Flexible Premium		
<b>Product Name:</b>	VCOLI		
<b>Project Name/Number:</b>	/		

## Disposition

Disposition Date: 12/03/2012

Implementation Date:

Status: Accepted For Informational Purposes

Comment:

Rate data does NOT apply to filing.

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		No
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	Statement of Variability		Yes

SERFF Tracking #:	SYMT-128784259	State Tracking #:	Company Tracking #:
State:	Arkansas	Filing Company:	Symetra Life Insurance Company
TOI/Sub-TOI:	L06I Individual Life - Variable/L06I.002 Single Life - Flexible Premium		
Product Name:	VCOLI		
Project Name/Number:	/		

Supporting Document Schedules

		Item Status:	Status Date:
Satisfied - Item:	Statement of Variability		
Comments:			
Attachment(s):			
L-10070_AR_1011_CD_SOV_20120523.pdf			
L-10070_AR_1011_Contract_SOV_20120523.pdf			
L-10077_1011_CVE_Rider_SOV_20121113.pdf			

# Statement of Variability

November 15, 2012

Symetra Life Insurance Company  
NAIC # 68608/ FEIN #91-0742147

Forms: L-10070/AR 10/11 Private Placement Flexible Premium Variable Adjustable Life Insurance (Coverage Description)

The variability for bracketed items in the above-referenced forms is provided below. This Statement of Variability reflects bracketing of items that will vary based upon policy specific information. In addition, this Statement of Variability also reflects bracketing of items that Symetra Life Insurance Company might vary within the range provided for future issues without requiring a re-filing. We have bracketed these items so we may more quickly respond to changes in the market, in company experience, or in the regulatory environment. Any changes made in such items will be determined based on sound actuarial practice and administered in a uniform and non-discriminatory manner. Since the policy is a private placement, certain elements will be negotiated as part of each transaction. With the exception of the current Company and address, such variable information will not be changed for issued policies, only for new issues.

L-10070/AR 10/11 Coverage Description		
Field	Range	Explanation of Variation
[Policy Number]		Displays the number in the Company's records that contains the information for this policy.
[Insured]		Displays the name of the person insured under the policy..
[Issue Date]	Month: 1-12 Day: 1-28 Year: 2011+	Displays the month, day and year that the policy becomes effective.
[Issue Age]	20-70	Displays the age, as of last birthday on the issue date.
[Monthly Anniversary]	1st – 28th	Displays the day, each month, based on the issued date, that monthly processing takes place.
[Class]	Male or Female, Non-Nicotine or Nicotine	Gender and rate class of the Insured
[Face Amount]	\$10,000 – \$20,000,000	Displays the amount of life insurance coverage under the base policy.
[Post Issue Face Amount Minimum]	\$10,000 - \$100,000	Minimum Face Amount after Issue permitted under this Policy. Decreases may not cause the Face Amount to drop below this amount.
[Initial Premium Amount]	\$10,000 - \$15,000,000	Displays the amount of the initial premium payment made to Symetra under this Policy.
[Planned Periodic Premium]	\$10,000 - \$15,000,000	Displays the elected Planned Periodic Premiums
[Premium Payable]	Annual, Semi-Annual, Quarterly, Monthly, Single	Displays the elected mode of payment
[Death Benefit Option]	Option A - Level Option B - Increasing Option C – Return of Premium	Displays the current death benefit option as elected by the owner.
[Death Benefit Test]	Guideline Premium Test or Cash Value Accumulation Test	Displays the death benefit test as elected by the owner.

[Guaranteed Minimum Interest Rate]	1% - 4%	Guaranteed Minimum Interest Rate for Fixed Account and Loan Collateral Account will vary with the interest rate environment at time of issue, as negotiated as part of the private placement transaction.
[Loan Interest Rate]	1% – 8%	Displays the rate charged for policy loans. Will vary with the interest rate environment at time of issue, as negotiated as part of the private placement transaction.
[Separate Account]	VL	Displays the name of the separate account for the policy.
[Riders]	CASH VALUE ENHANCEMENT	Displays riders selected for attachment to policy
[Guideline language]	<p>[The guideline single premium for this Policy is \$[13,512.07]. The guideline annual premium is \$[1,126.57]. The sum of the premiums paid at any date for this Policy may not exceed the greater of:</p> <ul style="list-style-type: none"> <li>• The guideline single premium, or</li> <li>• The sum of the guideline annual premiums to such date.</li> </ul> <p>These limitations are to assure that the death benefits paid under this Policy are not includable in the gross income of the beneficiary for federal income tax purposes.]</p>	Guideline 7702 test language. Only included if guideline test is being used to comply with 7702
[Guideline Single Premium]		Displays the guideline single premium amount based on the age, gender, class and face amount of the policy.
[Guideline Annual Premium]		Displays the guideline annual premium amount based on the age, gender, class and face amount of the policy.
[Cash Value Accumulation Test]	[This policy uses the Cash Value Accumulation Test to qualify as life insurance under the Internal Revenue Code. The Amount of Death Benefit will always be large enough to assure that the death benefits paid under this policy are not includable in the gross income of the beneficiary as prescribed by Internal Revenue Code section 7702 as amended.]	CVAT language. Only included if the Cash Value Accumulation Test is being used to comply with 7702
[7702A language (non-MEC)]	[The 7-pay premium as defined by the Tax and Miscellaneous Revenue Act of 1988 (TAMRA) is	Displays if Policy is a non-MEC at issue.

	\$[3,345.71]. (Note: If this Policy is a replacement of another Policy, the amount shown may need to be adjusted.) To maintain the non-modified endowment contract status of this Policy, the sum of the premiums paid at any date during the seven years commencing with the Issue Date or with the date of a subsequent material change cannot exceed the sum of the 7-pay premiums to such date.];	
[7-pay Premium]		For non-MEC issues, displays the 7 pay premium test, annual amount based on the age, gender, class and face amount of the policy.
[7702A language (MEC)]	[Because of its ratio of Initial Premium Amount to Death Benefit, your Policy will be treated as a Modified Endowment Contract (MEC) as required by the Internal Revenue Code. Amounts taken out while the Insured is still living, including loans and collateral assignments, may be subject to federal income tax. There may be a 10% tax penalty on the taxable amount taken.]	Displays if Policy is a MEC at issue.
[Guideline Premiums and] or [7-pay Premiums]		Displays "Guideline Premiums and" or "7-pay Premiums" dependent upon the death benefit test option selected.
[CVAT]	[We reserve the right to require evidence of insurability to be provided if any premium payment would result in an immediate increase in the difference between the death benefit and the Accumulation Fund. If satisfactory evidence is not received, the premium, or any portion of the premium, may be returned.]	CVAT language.
[Policy Number] (page CD-2)		Displays the number in the Company's records that contains the information for this policy.
[Guaranteed Sales Load]	0-15%	Guaranteed sales load percentage in all years. Varies with commissions paid, as negotiated as part of private placement transaction.
[Sales Load]	0-15% all years	Displays the sales load percentage, per year, used to calculate the charge taken from each premium payment.



		Varies with commissions paid, as negotiated as part of the private placement transaction.
[Premium Tax Charge]		The tax amount subtracted from each premium payment. The percentage will change with changes in law or issue state.
[Current Premium Charge]	0-2%	The current percent of gross premium charged for federal tax expenses associated with issuing the policy. Varies with actual expenses incurred, as negotiated as part of the private placement transaction.
[Guaranteed Maximum Premium Charge]	2%	The guaranteed percent of gross premium charged for federal tax expenses associated with issuing the policy. Varies with expected expenses to be incurred, as negotiated as part of the private placement transaction.
[Current Administration Expense]	\$0-5	Varies with policy admin expenses, as negotiated as part of private placement transaction.
[Guaranteed Maximum Administration Expense]	\$5	Varies with expected policy admin expenses, as negotiated as part of private placement transaction.
[Mortality and Expense Charge]	0-5%	Varies with policy size, issue age, and commissions paid, as negotiated as part of private placement transaction.
[# of Transfers]	0-24	The number of transfers among investment options allowed free of charge. Will vary depending on investment options as negotiated as part of private placement transaction.
[Transfer Charge]	\$0-50	The charge for additional transfers above the free # of transfers. Will vary with policy size as negotiated as part of private placement transaction.
[Policy Number] (page CD-3)		Displays the number in the Company's records that contains the information for this policy.
[Schedule of Guaranteed Maximum Cost of Insurance Rates]		Displays the guaranteed cost of insurance rates for the Insured's issue age, gender and class.
[Policy Number] (page CD-4)		Displays the number in the Company's records that contains the information for this policy.
[Table of Surrender Charges]	Year 1 0-8% Year 2 0-7% Year 3 0-6.5% Year 4 0-6% Year 5 0-5% Year 6 0-4.5% Year 7 0-4% Year 8 0-3% Year 9 0-2% Year 10 0-1% Thereafter 0%	Varies by policy size and commissions paid as negotiated as part of private placement transaction.

[Policy Number] (page CD-5)		Displays the number in the Company's records that contains the information for this policy.
[Table of Applicable Death Benefit Percentages]	[CVAT Schedule] [GPT Schedule]	Varies depending on whether CVAT or guideline premium test are used to comply with IRC section 7702. See SOV appendix for possible schedules.

### **CERTIFICATION**

I certify that the information contained in this Statement of Variability is true and correct to the best of my knowledge and belief, and that I am duly authorized by the company to make this certification.



Suzanne Webb Sainato  
Vice President  
Symetra Life Insurance Company  
November 15, 2012

# **APPENDIX** **TABLE OF APPLICABLE PERCENTAGES** **CVAT Factors**

Male		Female			Male		Female		
Age	Non	Male	Non	Female	Age	Non	Male	Non	Female
	<u>Nicotine</u>	<u>Nicotine</u>	<u>Nicotine</u>	<u>Nicotine</u>		<u>Nicotine</u>	<u>Nicotine</u>	<u>Nicotine</u>	<u>Nicotine</u>
20	800.55	643.49	925.16	735.70	60	210.98	187.13	236.74	201.94
21	774.80	623.04	892.81	710.00	61	204.94	182.58	229.99	197.01
22	749.70	603.27	861.61	685.26	62	199.19	178.27	223.51	192.28
23	725.23	584.17	831.43	661.40	63	193.73	174.20	217.28	187.74
24	701.45	565.71	802.21	638.37	64	188.55	170.36	211.28	183.38
25	678.33	547.88	774.00	616.18	65	183.62	166.72	205.51	179.18
26	655.94	530.68	746.74	594.85	66	178.91	163.25	199.96	175.13
27	634.29	514.07	720.52	574.30	67	174.40	159.91	194.63	171.24
28	613.29	497.94	695.20	554.49	68	170.07	156.69	189.51	167.50
29	592.79	482.20	670.80	535.42	69	165.91	153.56	184.59	163.92
30	572.82	466.80	647.27	517.04	70	161.91	150.53	179.87	160.48
31	553.39	451.75	624.58	499.33	71	158.08	147.60	175.35	157.19
32	534.49	437.09	602.72	482.28	72	154.44	144.80	171.02	154.05
33	516.17	422.83	581.64	465.87	73	150.99	142.14	166.87	151.06
34	498.44	409.01	561.35	450.08	74	147.71	139.59	162.91	148.22
35	481.27	395.63	541.83	434.94	75	144.58	137.14	159.12	145.50
36	464.69	382.67	523.07	420.39	76	141.61	134.80	155.49	142.90
37	448.68	370.16	505.01	406.40	77	138.77	132.57	152.02	140.41
38	433.25	358.10	487.61	392.92	78	136.09	130.44	148.70	138.03
39	418.39	346.49	470.81	379.91	79	133.57	128.45	145.52	135.74
40	404.06	335.31	454.61	367.36	80	131.21	126.57	142.48	133.55
41	390.28	324.56	438.99	355.25	81	129.00	124.82	139.59	131.47
42	377.03	314.26	423.94	343.58	82	126.94	123.18	136.89	129.56
43	364.30	304.40	409.44	332.36	83	125.01	121.63	134.35	127.78
44	352.10	294.98	395.49	321.57	84	123.19	120.15	131.95	126.12
45	340.40	285.99	382.08	311.21	85	121.50	118.77	129.69	124.56
46	329.19	277.39	369.20	301.27	86	119.93	117.49	127.53	123.07
47	318.42	269.14	356.84	291.75	87	118.48	116.32	125.50	121.66
48	308.05	261.19	344.99	282.65	88	117.15	115.24	123.61	120.36
49	298.01	253.48	333.64	273.99	89	115.92	114.26	121.86	119.16
50	288.33	246.01	322.77	265.74	90	114.80	113.36	120.20	118.01
51	279.00	238.82	312.36	257.89	91	113.75	112.52	118.53	116.78
52	270.03	231.92	302.40	250.42	92	112.74	111.71	116.79	115.42
53	261.44	225.32	292.88	243.30	93	111.75	110.90	115.06	114.00
54	253.22	219.04	283.77	236.52	94	110.76	110.08	113.37	112.54
55	245.37	213.08	275.04	230.07	95	109.74	109.21	111.72	111.09
56	237.88	207.42	266.70	223.92	96	108.61	108.23	110.07	109.63
57	230.73	202.03	258.72	218.06	97	107.28	107.03	108.30	108.04
58	223.88	196.87	251.09	212.45	98	105.59	105.46	106.19	106.06
59	217.70	191.91	243.77	207.08	99	103.30	103.26	103.48	103.45
					100+	100.00	100.00	100.00	100.00

## TABLE OF APPLICABLE PERCENTAGES GPT Factors

<u>Age</u>	Male Non	Male	Female Non	Female	<u>Age</u>	Male Non	Male	Female Non	Female
	<u>Nicotine</u>	<u>Nicotine</u>	<u>Nicotine</u>	<u>Nicotine</u>		<u>Nicotine</u>	<u>Nicotine</u>	<u>Nicotine</u>	<u>Nicotine</u>
20	250	250	250	250	60	130	130	130	130
21	250	250	250	250	61	128	128	128	128
22	250	250	250	250	62	126	126	126	126
23	250	250	250	250	63	124	124	124	124
24	250	250	250	250	64	122	122	122	122
25	250	250	250	250	65	120	120	120	120
26	250	250	250	250	66	119	119	119	119
27	250	250	250	250	67	118	118	118	118
28	250	250	250	250	68	117	117	117	117
29	250	250	250	250	69	116	116	116	116
30	250	250	250	250	70	115	115	115	115
31	250	250	250	250	71	113	113	113	113
32	250	250	250	250	72	111	111	111	111
33	250	250	250	250	73	109	109	109	109
34	250	250	250	250	74	107	107	107	107
35	250	250	250	250	75	105	105	105	105
36	250	250	250	250	76	105	105	105	105
37	250	250	250	250	77	105	105	105	105
38	250	250	250	250	78	105	105	105	105
39	250	250	250	250	79	105	105	105	105
40	250	250	250	250	80	105	105	105	105
41	243	243	243	243	81	105	105	105	105
42	236	236	236	236	82	105	105	105	105
43	229	229	229	229	83	105	105	105	105
44	222	222	222	222	84	105	105	105	105
45	215	215	215	215	85	105	105	105	105
46	209	209	209	209	86	105	105	105	105
47	203	203	203	203	87	105	105	105	105
48	197	197	197	197	88	105	105	105	105
49	191	191	191	191	89	105	105	105	105
50	185	185	185	185	90	105	105	105	105
51	178	178	178	178	91	104	104	104	104
52	171	171	171	171	92	103	103	103	103
53	164	164	164	164	93	102	102	102	102
54	157	157	157	157	94	101	101	101	101
55	150	150	150	150	95+	100	100	100	100
56	146	146	146	146					
57	142	142	142	142					
58	138	138	138	138					
59	134	134	134	134					

# Statement of Variability

November 15, 2012

Symetra Life Insurance Company  
NAIC # 68608/ FEIN #91-0742147

Forms: L-10070/AR 10/11 Private Placement Flexible Premium Variable Adjustable Life Insurance

The variability for bracketed items in the above-referenced forms is provided below. This Statement of Variability reflects bracketing of items that will vary based upon policy specific information. In addition, this Statement of Variability also reflects bracketing of items that Symetra Life Insurance Company might vary within the range provided for future issues without requiring a re-filing. We have bracketed these items so we may more quickly respond to changes in the market, in company experience, or in the regulatory environment. Any changes made in such items will be determined based on sound actuarial practice and administered in a uniform and non-discriminatory manner. Since the policy is a private placement, certain elements will be negotiated as part of each transaction. With the exception of the current Company and address, such variable information will not be changed for issued policies, only for new issues.

L-10070/AR 10/11 Policy		
Field	Range	Explanation of Variation
[Insured]		Displays the Insured person's name
[Owner]		Displays the current owner's name
[Policy Number]		Displays the number in the Company's records that contains the information for this policy.
[Rate Class]	Non-Nicotine, Nicotine	Rating class based on nicotine status
[Issue Date]		The day, month and Year that the policy becomes effective.
[Gender]	Male, Female	Gender of the Insured
[Officer Signatures]		Displays the signatures of current officers. In the event the name of an officer signing the policy form changes, any new signature utilized will be the name of an officer of the company.
[Officer Names]		Displays the printed names of the current officers. In the event the name of an officer signing the policy form changes, any new name utilized will be the name of an officer of the company.
[Officer Titles]		Displays the titles of the officers. In the event the title of an officer signing the policy form changes, any new title utilized will be the title of an officer of the company.
[Right to Examine]		The Right to Examine provision may be updated in the future for changes in statutory requirements.
[Company Name]		Displays the current legal name of the Company.

[Company Phone]		Displays the current phone of the Company.
[Company Address]		Displays the current address of the company's Home Office and the Company's website address

### **CERTIFICATION**

I certify that the information contained in this Statement of Variability is true and correct to the best of my knowledge and belief, and that I am duly authorized by the company to make this certification.



Suzanne Webb Sainato  
Vice President  
Symetra Life Insurance Company  
November 15, 2012

# **APPENDIX** **TABLE OF APPLICABLE PERCENTAGES** **CVAT Factors**

<u>Age</u>	<u>Male</u>		<u>Female</u>		<u>Age</u>	<u>Male</u>		<u>Female</u>	
	<u>Non</u>	<u>Male</u>	<u>Non</u>	<u>Female</u>		<u>Non</u>	<u>Male</u>	<u>Non</u>	<u>Female</u>
	<u>Nicotine</u>	<u>Nicotine</u>	<u>Nicotine</u>	<u>Nicotine</u>		<u>Nicotine</u>	<u>Nicotine</u>	<u>Nicotine</u>	<u>Nicotine</u>
20	800.55	643.49	925.16	735.70	60	210.98	187.13	236.74	201.94
21	774.80	623.04	892.81	710.00	61	204.94	182.58	229.99	197.01
22	749.70	603.27	861.61	685.26	62	199.19	178.27	223.51	192.28
23	725.23	584.17	831.43	661.40	63	193.73	174.20	217.28	187.74
24	701.45	565.71	802.21	638.37	64	188.55	170.36	211.28	183.38
25	678.33	547.88	774.00	616.18	65	183.62	166.72	205.51	179.18
26	655.94	530.68	746.74	594.85	66	178.91	163.25	199.96	175.13
27	634.29	514.07	720.52	574.30	67	174.40	159.91	194.63	171.24
28	613.29	497.94	695.20	554.49	68	170.07	156.69	189.51	167.50
29	592.79	482.20	670.80	535.42	69	165.91	153.56	184.59	163.92
30	572.82	466.80	647.27	517.04	70	161.91	150.53	179.87	160.48
31	553.39	451.75	624.58	499.33	71	158.08	147.60	175.35	157.19
32	534.49	437.09	602.72	482.28	72	154.44	144.80	171.02	154.05
33	516.17	422.83	581.64	465.87	73	150.99	142.14	166.87	151.06
34	498.44	409.01	561.35	450.08	74	147.71	139.59	162.91	148.22
35	481.27	395.63	541.83	434.94	75	144.58	137.14	159.12	145.50
36	464.69	382.67	523.07	420.39	76	141.61	134.80	155.49	142.90
37	448.68	370.16	505.01	406.40	77	138.77	132.57	152.02	140.41
38	433.25	358.10	487.61	392.92	78	136.09	130.44	148.70	138.03
39	418.39	346.49	470.81	379.91	79	133.57	128.45	145.52	135.74
40	404.06	335.31	454.61	367.36	80	131.21	126.57	142.48	133.55
41	390.28	324.56	438.99	355.25	81	129.00	124.82	139.59	131.47
42	377.03	314.26	423.94	343.58	82	126.94	123.18	136.89	129.56
43	364.30	304.40	409.44	332.36	83	125.01	121.63	134.35	127.78
44	352.10	294.98	395.49	321.57	84	123.19	120.15	131.95	126.12
45	340.40	285.99	382.08	311.21	85	121.50	118.77	129.69	124.56
46	329.19	277.39	369.20	301.27	86	119.93	117.49	127.53	123.07
47	318.42	269.14	356.84	291.75	87	118.48	116.32	125.50	121.66
48	308.05	261.19	344.99	282.65	88	117.15	115.24	123.61	120.36
49	298.01	253.48	333.64	273.99	89	115.92	114.26	121.86	119.16
50	288.33	246.01	322.77	265.74	90	114.80	113.36	120.20	118.01
51	279.00	238.82	312.36	257.89	91	113.75	112.52	118.53	116.78
52	270.03	231.92	302.40	250.42	92	112.74	111.71	116.79	115.42
53	261.44	225.32	292.88	243.30	93	111.75	110.90	115.06	114.00
54	253.22	219.04	283.77	236.52	94	110.76	110.08	113.37	112.54
55	245.37	213.08	275.04	230.07	95	109.74	109.21	111.72	111.09
56	237.88	207.42	266.70	223.92	96	108.61	108.23	110.07	109.63
57	230.73	202.03	258.72	218.06	97	107.28	107.03	108.30	108.04
58	223.88	196.87	251.09	212.45	98	105.59	105.46	106.19	106.06
59	217.70	191.91	243.77	207.08	99	103.30	103.26	103.48	103.45
					100+	100.00	100.00	100.00	100.00

## TABLE OF APPLICABLE PERCENTAGES GPT Factors

<u>Age</u>	<u>Male Non Nicotine</u>	<u>Male Nicotine</u>	<u>Female Non Nicotine</u>	<u>Female Nicotine</u>	<u>Age</u>	<u>Male Non Nicotine</u>	<u>Male Nicotine</u>	<u>Female Non Nicotine</u>	<u>Female Nicotine</u>
20	250	250	250	250	60	130	130	130	130
21	250	250	250	250	61	128	128	128	128
22	250	250	250	250	62	126	126	126	126
23	250	250	250	250	63	124	124	124	124
24	250	250	250	250	64	122	122	122	122
25	250	250	250	250	65	120	120	120	120
26	250	250	250	250	66	119	119	119	119
27	250	250	250	250	67	118	118	118	118
28	250	250	250	250	68	117	117	117	117
29	250	250	250	250	69	116	116	116	116
30	250	250	250	250	70	115	115	115	115
31	250	250	250	250	71	113	113	113	113
32	250	250	250	250	72	111	111	111	111
33	250	250	250	250	73	109	109	109	109
34	250	250	250	250	74	107	107	107	107
35	250	250	250	250	75	105	105	105	105
36	250	250	250	250	76	105	105	105	105
37	250	250	250	250	77	105	105	105	105
38	250	250	250	250	78	105	105	105	105
39	250	250	250	250	79	105	105	105	105
40	250	250	250	250	80	105	105	105	105
41	243	243	243	243	81	105	105	105	105
42	236	236	236	236	82	105	105	105	105
43	229	229	229	229	83	105	105	105	105
44	222	222	222	222	84	105	105	105	105
45	215	215	215	215	85	105	105	105	105
46	209	209	209	209	86	105	105	105	105
47	203	203	203	203	87	105	105	105	105
48	197	197	197	197	88	105	105	105	105
49	191	191	191	191	89	105	105	105	105
50	185	185	185	185	90	105	105	105	105
51	178	178	178	178	91	104	104	104	104
52	171	171	171	171	92	103	103	103	103
53	164	164	164	164	93	102	102	102	102
54	157	157	157	157	94	101	101	101	101
55	150	150	150	150	95+	100	100	100	100
56	146	146	146	146					
57	142	142	142	142					
58	138	138	138	138					
59	134	134	134	134					



# Statement of Variability

November 13, 2012

Symetra Life Insurance Company  
NAIC # 68608/ FEIN #91-0742147

Forms: L-10077 10/11 Cash Value Enhancement Rider

The variability for bracketed items in the above-referenced forms is provided below. This Statement of Variability reflects bracketing of items that will vary based upon policy specific information. In addition, this Statement of Variability also reflects bracketing of items that Symetra Life Insurance Company might vary within the range provided for future issues without requiring a re-filing. We have bracketed these items so we may more quickly respond to changes in the market, in company experience, or in the regulatory environment. Any changes made in such items will be determined based on sound actuarial practice and administered in a uniform and non-discriminatory manner. Since the policy is a private placement, certain elements will be negotiated as part of each transaction. With the exception of the current Company and address, such variable information will not be changed for issued policies, only for new issues.

L-10077 10/11 Cash Value Enhancement Rider		
[Officer Signature]		Displays the signature of a current officer. In the event the name of an officer signing the policy form changes, any new signature utilized will be the name of an officer of the company.
[Officer Name]		Displays the printed name of a current officer. In the event the name of an officer signing the policy form changes, any new name utilized will be the name of an officer of the company.
[Officer Title]		Displays the title of a current officer. In the event the title of an officer signing the policy form changes, any new title utilized will be the title of an officer of the company.
[Enhancement Percentage Schedule]	0-900% in all years	Varies with policy size, sales load schedule, and commission paid as negotiated as part of private placement transaction.

## CERTIFICATION

I certify that the information contained in this Statement of Variability is true and correct to the best of my knowledge and belief, and that I am duly authorized by the company to make this certification.



Suzanne Webb Sainato  
Vice President  
Symetra Life Insurance Company  
November 13, 2012